

Message

From: Welles, Laura [Welles.Laura@epa.gov]
Sent: 1/5/2017 5:25:11 PM
To: Fogarty, Johnpc [Fogarty.Johnpc@epa.gov]
Subject: FW: RCRA - SEPs
Attachments: AWS Approval Memo 02_07_12.docx

Beth had pointed me to the AWS settlement.

From: Welles, Laura
Sent: Tuesday, January 03, 2017 11:18 AM
To: Cavalier, Beth <Cavalier.Beth@epa.gov>
Subject: RE: RCRA - SEPs

Beth – I wasn't able to find a memo to the EAB, but I did find the attached memo to Cynthia Giles. Thanks, Laura

From: Cavalier, Beth
Sent: Tuesday, January 03, 2017 10:12 AM
To: Welles, Laura <Welles.Laura@epa.gov>; Makepeace, Caroline <Makepeace.Caroline@epa.gov>
Cc: Crossland, Andy <Crossland.Andy@epa.gov>; Saenz, Diana <Saenz.Diana@epa.gov>
Subject: Re: RCRA - SEPs

<https://www.epa.gov/enforcement/att-wireless-settlement>

Laura, the AWS settlement might be a good example for you to look at. Check out the Consent Agreement on the SEP Intranet site (link above.)

Beth Cavalier
National SEP Policy Coordinator
Cross Cutting Policy Staff
Office of Civil Enforcement
(202) 564-3271

From: Welles, Laura
Sent: Tuesday, January 3, 2017 10:02 AM
To: Cavalier, Beth; Makepeace, Caroline
Cc: Crossland, Andy; Saenz, Diana
Subject: RE: RCRA - SEPs

Caroline and Beth,

Happy New Year! I'm working on drafting an EAB memo for the Whole Foods matter – do you have an old EAB memo with a SEP that I could use as an example? I want to see how the SEP should be presented, etc. to the EAB.

Thanks,
Laura

Laura Welles
Attorney Advisor

Waste and Chemical Enforcement Division
Office of Civil Enforcement
U.S. Environmental Protection Agency
(202) 564-2754

From: Cavalier, Beth
Sent: Wednesday, September 28, 2016 2:28 PM
To: Welles, Laura <Welles.Laura@epa.gov>; Makepeace, Caroline <Makepeace.Caroline@epa.gov>; Saenz, Diana <Saenz.Diana@epa.gov>; Crossland, Andy <Crossland.Andy@epa.gov>
Subject: RE: RCRA - SEPs

Thanks!

From: Welles, Laura
Sent: Wednesday, September 28, 2016 12:39 PM
To: Makepeace, Caroline <Makepeace.Caroline@epa.gov>; Cavalier, Beth <Cavalier.Beth@epa.gov>; Saenz, Diana <Saenz.Diana@epa.gov>; Crossland, Andy <Crossland.Andy@epa.gov>
Subject: RE: RCRA - SEPs

The context is similar to Region 6's recent settlement with Whole Foods – <https://www.epa.gov/newsreleases/whole-foods-agrees-improve-waste-management-epa-settlement>

R6's CAFO involved two RCRA counts: (1) failure to make HW determinations and (2) failure to comply with the Universal Waste Requirements (see attached CAFO).

<< File: 6ENH.Whole Foods Market CAFO.TX.09.19.16.pdf >>

I hope this helps.

Laura

Laura Welles
Attorney Advisor
Waste and Chemical Enforcement Division
Office of Civil Enforcement
U.S. Environmental Protection Agency
(202) 564-2754

From: Makepeace, Caroline
Sent: Wednesday, September 28, 2016 12:12 PM
To: Cavalier, Beth <Cavalier.Beth@epa.gov>; Saenz, Diana <Saenz.Diana@epa.gov>; Crossland, Andy <Crossland.Andy@epa.gov>; Welles, Laura <Welles.Laura@epa.gov>
Subject: RE: RCRA - SEPs

Yes, please, that'd be most efficient and effective, instead of just starting the wheels turning tomorrow afternoon – especially if you are in any hurry. Can't really do SEP analysis without specific context.

Caroline Makepeace
Chief, Litigation and Cross-Cutting Policy Branch, and
Acting Chief, Litigation and Audit Policy Branch
Special Litigation and Projects Division
Office of Civil Enforcement
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202-564-6012

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From: Cavalier, Beth

Sent: Wednesday, September 28, 2016 10:33 AM

To: Makepeace, Caroline <Makepeace.Caroline@epa.gov>; Saenz, Diana <Saenz.Diana@epa.gov>; Crossland, Andy <Crossland.Andy@epa.gov>; Welles, Laura <Welles.Laura@epa.gov>

Subject: RE: RCRA - SEPs

Diana, Andy, Laura – it would be helpful to know what sort of violations you are dealing with, as the nexus requirement will depend greatly on the type of violation, the pollutant, the impacts.... Can you provide any information about the enforcement action in question ahead of the meeting? Thanks!!

Beth

From: Makepeace, Caroline

Sent: Wednesday, September 28, 2016 10:25 AM

To: Saenz, Diana <Saenz.Diana@epa.gov>; Cavalier, Beth <Cavalier.Beth@epa.gov>; Crossland, Andy <Crossland.Andy@epa.gov>; Welles, Laura <Welles.Laura@epa.gov>

Subject: RE: RCRA - SEPs

Look forward to talking, but just a heads-up that I need to leave for the 1st item at the Cynthia general at 3. See you tomorrow.

Caroline Makepeace
Chief, Litigation and Cross-Cutting Policy Branch, and
Acting Chief, Litigation and Audit Policy Branch
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Office of Civil Enforcement
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-----Original Appointment-----

From: Saenz, Diana

Sent: Wednesday, September 28, 2016 10:23 AM

To: Makepeace, Caroline; Cavalier, Beth; Crossland, Andy; Welles, Laura

Subject: RCRA - SEPs

When: Thursday, September 29, 2016 2:00 PM-3:00 PM (UTC-05:00) Eastern Time (US & Canada).

Where: DCRoomARS4140VideoConf@epa.gov

Brainstorm Potential RCRA SEPs.